

Winchester District Local Plan Part 1 – Joint Core Strategy

Submission June 2012

**Background Paper – 2
Affordable Housing Policies**

June 2012



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1. Introduction

- 1.1. The issue of affordable housing has generated many comments during the Local Plan process. While during any consultation process it is unusual for there to be a consensus in the views expressed, in the case of affordable housing provision there has been considerable support for the principle of providing more affordable housing, in particular to meet local needs. Matters surrounding the implications for development interests have, however, created more debate.
- 1.2. Against this background it is clear that the Local Plan could never satisfy all stakeholders, although the Council has sought to achieve better understanding of the issues through the various stakeholder engagement and consultation exercises that have been undertaken. In developing its preferred approach the Council has always sought to ensure that its approach is justified, reflects prevailing government and is evidence-based.
- 1.3. This Background Paper does not seek to respond in detail to every specific representation that has been made on the Pre-Submission Local Plan or earlier documents. Instead it covers the following key issues:
 - The requirements of legislation, government policy and guidance and how these have been taken into account and met in developing the Local Plan;
 - The evidence that has been developed and taken into account,
 - How the strategy for affordable housing has been developed, taking account of the available evidence and the results of consultation;
 - Proposed changes to the Plan as a consequence of consultation and evidence;
 - Alternatives considered, and;
 - The preferred approach
- 1.4. The Paper concludes that the approach taken to affordable housing is the most appropriate, taking account of Government advice and policy, the available evidence, and the outcome of consultation.

2. Policy Background

National Planning Policy Framework

- 2.1. The National Planning Framework (NPPF) was published by Government in 2012. It replaces a number of key Government policy documents that were important in the evolution of this Plan, namely Planning Policy Statements.
- 2.2. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It emphasises the mutual dependency of the three dimensions of sustainable development, economic, social and environmental. It establishes that the planning system should pay an active role in guiding development to sustainable solutions. In particular it seeks positive improvements to the conditions within which people live and to widen the choice of high quality homes (paragraph 9).
- 2.3. Chapter 6 *Delivering a Wide Choice of High Quality Homes* sets out in more detail the Government's approach to affordable housing. Local Planning Authorities (LPAs) are required to use their evidence base to objectively assess the need for affordable housing (paragraphs 47).
- 2.4. In order to create sustainable, inclusive and mixed communities LPAs should plan for a mix of housing and identify the size, type range and tenure of housing that is required. Where a need for affordable housing is identified policies should be set for meeting this need, as a priority, on site (paragraph 50)
- 2.5. Annex 2 sets out that affordable housing is Social Rented, Affordable Rented and Intermediate housing provided to eligible households whose needs are not met by the market.
- 2.6. In rural areas LPAs should co-operate with neighbouring LPAs and plan for housing to meet local needs, including through rural exception sites. The NPPF encourages LPAs to consider whether some market housing on 'exception sites' would facilitate the provision of significant additional affordable housing to meet local needs (paragraph 54).
- 2.7. Chapter 8 *Promoting Healthy Communities* emphasises the role of the planning system in creating healthy, inclusive communities. This includes creating safe and accessible environments and developments that promote the opportunity for meetings between members of the community. It also requires LPAs to take a positive and collaborative approach with communities, including in relation to the Community Right to Build (paragraphs 69/71).
- 2.8. As part of their plan-making evidence base LPAs should prepare a Strategic Housing Market Assessment (SHMA) which should identify the scale and mix of housing and range of tenures needed over the

plan period. This should include affordable housing and the needs of different groups in the community, including (but not limited to) families with children, older people and people with disabilities (paragraph 159).

- 2.9. The NPPF requires Plans to be deliverable with particular attention being paid to viability. Plans should set out requirements for affordable housing. Standards and policies should not put implementation of the Plan at serious risk, and should facilitate development throughout the economic cycle. Where practical Community Infrastructure Levy (CIL) charges should be worked up and tested alongside the Plan. Affordable housing requirements should be assessed at the plan-making stage, where possible, and kept under review (paragraphs 173-177).

Government Policy Replaced by the National Planning Policy Framework

- 2.10. In order to illustrate how the Plan has been developed in accordance with Government guidance this section sets out background information with regard to policies that have now been replaced by the NPPF.
- 2.11. PPS 1: 'Delivering Sustainable Development' made clear the Governments' commitment to developing strong, vibrant and sustainable communities and promoting community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens (para 14).
- 2.12. It established that development plans should promote development that creates socially inclusive communities, including suitable mixes of housing; seek to reduce social inequalities; address accessibility for all members of the community to housing; taking into account the needs of all the community, including particular requirements relating to age, disability or income (para 16). Furthermore it set out broad objectives for development plans, including to ensure the provision of adequate levels of affordable housing in suitable locations and to ensure that everyone has the opportunity of a decent home (para 23).
- 2.13. PPS1: Supplement Planning and Climate Change stated that when considering the need to secure affordable housing opportunities in rural areas to meet the needs of local people, planning authorities should recognise that an otherwise acceptable site may not be readily accessible by means of travel other than the private car(para 25).
- 2.14. PPS3 'Housing' dealt specifically with housing and was the key source of Government policy during the preparation of the Local Plan. PPS 3 made clear that the Government's policy goal is to ensure that

everyone can live within a sustainable mixed community where they want to live. The Government is committed to providing high quality housing for people who are unable to access or affordable market housing. A mix of housing should be provided in terms of price and tenure in both urban and rural areas (paras 3, 9, 10). Local Plans should set targets for both Social-Rented and Intermediate affordable housing (the 2011 update also includes Affordable Rented housing in the definition of affordable housing) and specify the size and type of affordable housing needed. Local Plans also need to set out when affordable housing will be required and to be positive towards rural affordable housing development, including allocating sites solely for affordable housing and using a Rural Exception Site Policy (paras 20-30).

- 2.15. *Delivering Affordable Housing* (the Government's companion document to PPS3) restates the Housing Corporation's (now Homes and Communities Agency) position that the preference is for affordable housing on market led sites to be delivered without grant input when economically viable and that grant should not be used to artificially inflate land prices (paras 9, 91).

Other Government Policy and Advice

- 2.16 *Laying the Foundations: A Housing Strategy for England* was published by Government in 2011. The Strategy contains a series of measures including those of a fiscal, regulatory and land use planning nature. It makes clear that the right home in the right place is essential for people seeking to support their families and sustain work. Housing needs to be suitable for the size and shape of the household. However too many families struggle to meet their housing needs (page1). The Strategy develops ideas around a number of themes relevant to affordable housing, in particular:

- Chapter 2: Increasing Supply. This includes encouraging new affordable housing with Local Plans supporting delivery and meeting the needs of different groups in the community, including older and disabled persons (paragraph 76). The Strategy recognises there are particular challenges in rural areas and the need for LPAs to consider whether some market development can facilitate the provision of significant affordable housing to meet local needs (Ch 2, paragraph 79).
- Chapter 3: Social and Affordable Housing Reform. The Strategy emphasises both housing's personal role and the role it plays in supporting mixed sustainable communities and local economies (page 21). It identifies a real need for more social housing (Ch 3, paragraph 4). The Government's investment in affordable housing is an important part of meeting needs (Ch 3, paragraph 24). However, new ways of stimulating investment and delivering

affordable housing are also important, for instance through the Affordable Rent Product (Ch 3, paragraph 29/30), the registration of publicly quoted companies (Ch 3, paragraph 44), and council housing finance reform (Ch 3, paragraph 50-52).

- Chapter 6: Quality of Housing Experience and Support. The Government is committed to providing choice and opportunity, and to ensuring a stable home, to vulnerable households and families on low incomes and working households (page 45). New housing developments need to make suitable provision for the ageing population, including providing a mix of property types and Lifetime Homes (Ch 6, paragraph 24). The Welfare Reform Bill (now 2012 Act) provides a new basis for benefit payments to households, including those in affordable housing ((Ch 3, paragraph 39-55).

- 2.17 The Government Publication *Lifetime Homes, Lifetime Neighbourhoods: A Strategy for an Ageing Society* (2008) set out the (then) Government's approach to the challenge of an aging society. It signals the move towards the building of new homes to Lifetime Homes standards as the norm and the creation of lifetime neighbourhoods. It also aims to provide opportunities for people to move towards specialised accommodation in later life.
- 2.18 In 2009 the Government published its response to the 2008 *Taylor Review into the Rural Economy and Affordable Housing*. In doing so it emphasised that its principal policy considerations for the countryside included creating and maintaining sustainable communities and encouraging an increase in the supply of housing in the long term, particularly affordable housing. The response indicates that local authorities need to be proactive housing enablers, to consider whether new development can contribute towards sustainability even in very small villages and that they need to take a strategic view of their area through their Local Development Frameworks.

3. Local Policy and Strategy

- 3.1 Regional planning guidance is currently set out in the South East Plan. This was adopted in 2009, superseding the Hampshire County Structure Plan Review, and its later stages of development paralleled the production of the Local Plan/Core Strategy. It remains a test of legal conformity that the Plan should be in general conformity with the South East Plan, but this only applies for as long as the regional strategy exists.
- 3.2 The Winchester District Plan Local Plan Review (2006) aims to maximise the supply of affordable housing (para. 6.7). It includes Policy H5 that aims to provide between 30% and 40% affordable housing (depending on location) on sites of 5 or more dwellings (or greater than 0.17 ha) in smaller settlements and of 15 or more dwellings (or 0.5 ha or more) in larger settlements. Policy H6 provides for 'exception sites' to be permitted to create affordable housing for local people.
- 3.3 The Council's Housing Strategy (<http://www.winchester.gov.uk/General.asp?id= SX9452-A7844657>) was adopted in 2008. It adopts as its vision the need to ensure communities are sustainable and inclusive. It identifies key housing challenges as including, housing affordability, increasing numbers of households in housing need in urban and rural parts of the District, and the need to meet the housing needs of the vulnerable and disadvantaged. Its top priorities include:
- To improve the supply of affordable homes and meet local needs.
 - To promote independent living and provide support for vulnerable and disadvantaged households, in particular homeless households with complex needs and older persons.
 - To ensure an adequate housing supply to support the local economy and meet local needs, including enabling affordable housing to be provided on rural exception sites.
 - To work effectively with communities to help them achieve their aspirations, including facilitating community/stakeholder involvement in identifying and developing solutions to housing problems.
- 3.4 Objectives also include ensuring new affordable housing is well integrated with market housing and improving the supply of Lifetime Homes (page 45).
- 3.5 The Council's Older Persons Action Plan (2008) recognises the implications of an aging population for the District (http://www.winchester.gov.uk/Documents/Housing/Strategy/Older_Per

[sons Hsg Action Plan.pdf](#)). It has at its priority enabling older people to have a choice of accommodation and support that suits their needs, promotes independence and is affordable. This includes enabling people to have access to extra care accommodation and ensuring new build homes are built to Lifetime Homes standards. However, the Action Plan makes clear that the housing needs of many older people can be met by the provision of a range of services that suit their particular needs, rather than 'bricks and mortar' solutions.

- 3.6 The Council's *Rural Housing Development Action Plan* (2008) (<http://www.winchester.gov.uk/Documents/Housing/Strategy/Rural%20Housing%20Development.pdf>) identifies the high levels of unmet affordable housing need in rural communities and the importance of a mix of housing types to the sustainability of villages. It estimates over 2000 households in rural areas have a housing need and a connection to a specific village, for instance through employment or family. It sets an objective of increasing the supply of affordable housing in rural areas to meet local needs.
- 3.7 In 2012 the Council agreed a programme of *Council House Building* to complement delivery of affordable housing by the Registered Providers (RPs), which has been the main route of delivery over the past two decades. The priority is to provide affordable housing additional to that provided by RPs. To do this the Council has developed a building programme in excess of £40m and created a New Homes Delivery Team.
- 3.8 *Hampshire Home Choice* (<http://www.hampshirehomechoice.org.uk/Data/ASPPages/1/30.aspx>) is a cross boundary partnership initiative between Winchester City Council, East Hampshire District Council and Havant Borough Council. Originally receiving pump-priming from Government, the initiative provides access to affordable homes for those in need across the housing markets. Over 14,000 households in need are currently on the register. The figures quoted in this Paper and used for the SHMA(s) are, however, just those for Winchester District.
- 3.9 The *Partnership for Urban South Hampshire* (PUSH), <http://www.push.gov.uk/>, *Housing and Planning Outcomes 2006-2026*, <http://www.push.gov.uk/work/housing-and-planning/housing-and-planning-outcomes.htm>, seeks:
- A balanced housing supply with the right kinds of homes in the right numbers in the right places including homes for families.
 - Greater opportunity for people to buy their own homes including up to 40% of new homes to be affordable housing, of which 65% should be for rent.

- 3.10 PUSH's *Sub-Regional Housing Strategy*, <http://www.push.gov.uk/work/housing-and-planning/sub-regional-housing-strategy.htm>, includes as priorities:
- To support economic growth by increasing the supply of housing to deliver a balanced housing market including family and affordable homes
 - To meet the needs of everyone including homeless and vulnerable groups.
- 3.11 PUSH has developed a *Common Policy Framework for Affordable Housing*, <http://www.push.gov.uk/pjc-080128-r02-bco-rjo.pdf>, to ensure a consistent approach to the delivery of affordable housing across the sub-region. It is a central priority for South Hampshire to ensure the affordable and key worker housing needs of the sub-region are met so as to support the economic development strategy, as well as to deliver good quality public services. It aims to ensure that 30-40% of housing on new development sites should be affordable housing. Research shows a need for affordable housing in South Hampshire to be about two thirds rented and one third shared ownership. Partner authorities, which include Winchester, have the responsibility of determining the options that exist to meet affordable housing needs.
- 3.12 The PUSH Local Investment Plan (<http://www.push.gov.uk/pjc-120326-r05-jch-appendix-a.pdf>) and North and Central Hampshire M3 Local Investment Plan (<http://www.rushmoor.gov.uk/CHttpHandler.ashx?id=3280&p=0>) have amongst their priorities meeting housing needs, providing family homes and rural housing.
- 3.13 The *Hampshire Alliance for Affordable Housing* (HARAH), <http://www.harah.org.uk/>, is a rural affordable housing delivery partnership between Hampshire local and national park authorities, the Homes and Communities Agency (HCA) and Hyde Housing Association. It has provided 150 affordable homes on rural exception sites and has 250 more homes in the pipeline. HARAH brings together a range of skills, including housing, planning, development and land assembly expertise, and continues to attract significant private and public sector investment. It has also collaborated to advice on LDF policies and a produced a joint *HARAH Planning Statement*, <http://www.harah.org.uk/about-harah/harah-library/>. Its vision is to ensure that communities are sustainable and inclusive by enabling an increase in the supply of affordable housing to meet needs. This includes maximising affordable housing supply.

4. Evidence Base

- 4.1 This section of the Background Paper highlights headline issues drawn from the evidence base. This is made up of a series of complementary studies. Full reports can be found in the LDF Evidence Base and appropriate hyperlinks and references are provided below.

The Housing Market, Affordability and Affordable Housing Need

- 4.2 The Council has used a number of different sources to inform the proposed approach to affordable housing provision, in particular its Strategic Housing Market Assessment, Affordability Study, Viability Report, and specific information collected as part of its operation of, for instance, its housing register and homelessness services.
- 4.3 The Council originally commissioned, from DTZ, a sub-regional *Strategic Housing Market Assessment* (SHMA) jointly with neighbouring authorities, which was published in 2007 (<http://www.winchester.gov.uk/planning-policy/evidence-base/housing/housing-market-assessment-2007/>). Together with Winchester City Council, East Hampshire, New Forest District Councils and Test Valley and Basingstoke and Deane Borough Councils jointly commissioned to study. This, and subsequent updates and annual housing sub-regional housing market reviews for the Central Hampshire Housing Market and PUSH areas, have informed the evolution of the Plan. The SHMA was last updated (for Winchester District only) in 2011 (2011 SHMA) (<http://www.winchester.gov.uk/planning-policy/evidence-base/housing/>)
- 4.4 The 2011 SHMA identifies the District's **housing markets**. A relatively integrated housing market exists within the south of the District, broadly reflecting the PUSH area, with a far less integrated market in the remainder of the District which relates to markets in adjoining local authority areas (Central Hampshire). Winchester Town Area (referred to as City in the study) is identified as a local housing market (Chapter 2). Although the District's population is just under 112,000 people, the wider market areas' population estimates are 1.2 million (para. 3.1).
- 4.5 The characteristics of the Winchester District market largely mirror the profile of nearby areas, though with a lower proportion of younger people and higher proportion of older people. It is notable that population growth is driven to a significant extent by the 25-44 and 45-64 age groups. The impact of in migration of families with children in the 25-44 age group is important as a proportion of this group are from higher value areas (including London), often with significant purchasing power due to greater equity and earnings. The consequence has been an inflationary impact on local house prices. There has also been a significant growth in the 75 years + age group, although from a smaller population base. Winchester Town has a relatively high proportion of

multi-person households which is likely to be due to young single adults, including students. (Chapter 3).

- 4.6 The 2007 SHMA considered in some detail the needs of **older persons** and the implications of the District's changing population and age structure, and the needs of those with a **disability** (Chapter 10). While age in itself does not necessarily bring with it particular housing requirements, there can be implications, for instance in relation to choice or health. While older people are less likely to move, sometimes being seen as under-occupying homes, this does create benefits in terms of social cohesion and community stability and they are thus an ingredient of a mixed community. In some cases wider care needs will need to be met, for instance through specialist accommodation. In others more basic needs relating to, for instance, mobility may be important. Most older persons live in mainstream housing rather than specialised housing, and where care is needed this can be supplied in-situ, or dwellings adapted when necessary. This means that there is not a direct correlation between an ageing population and the demand for specialised schemes for older persons.
- 4.7 Disabled people are a significant group within the District's population with some of these households having specific housing requirements, including those relating to mobility. Disability is often linked to age and therefore levels of disability are likely to increase as the population ages. The flexibility, for instance, that Lifetime Homes can offer can help address some of the housing requirements arising out of communities changing needs.
- 4.8 Turning more specifically to **market affordability and numbers of affordable homes needed**.
- 4.9 Average house prices in the District significantly exceed those in surrounding areas, and more generally, the South East. Despite the housing market downturn, prices remain relatively high and, as incomes have not grown by the same scale, affordability has worsened in the past decade (Chapter 6)
- 4.10 The 2011 SHMA shows that Average District prices (Q2 2010) are in excess of £375,000, with lower quartile prices £211,000. With average household incomes less than £50,000 per annum across the District an affordability problem becomes evident.
- 4.11 The 2011 SHMA Figure 6.7 sets out Purchase Income Thresholds (the income needed to afford a lower quartile priced home in the District). Overall, an annual household income of over £63,000 is needed to purchase a home, with significantly higher levels in some parts of the District. This is in excess of average household incomes, and importantly, well in excess of lower quartile incomes (£23,000, SHMA Figure 6.8). 2011 SHMA Figure 6.19 illustrates the District's Affordability Ratio (ratio of lower quartile prices: lower quartile incomes,

the Government's preferred measure of affordability) to be 10.5:1, much higher than the South East average. This presents a difficulty for households seeking to trade up, but most particularly for new forming households and first time buyers who have significant problems in accessing owner occupation.

- 4.12 The 2011 SHMA also presents a picture of un-affordability in market rented properties. Figure 6.9 illustrates that 30- 45% of households are unable to afford to rent a 2 bedroom property on the open market unassisted (para. 6.17). Particular problems exist for newly-forming households with the 2011 SHMA estimating that over 70% of new households are unable to rent in the open market (para 7.24). The unaffordability of the private rented sector creates additional pressure on affordable housing.
- 4.13 Finally, in terms of affordability, 2011 SHMA Figure 7.2 illustrates the incomes of those on the Council's Housing Register. It can be seen that almost 80% of registered households have incomes of less than £15,000 a year, significantly lower than lower quartile levels.
- 4.14 In order to translate this to affordable housing need, the 2011 SHMA uses the Government needs assessment model (for Social and Affordable Rent) and analyses the Homes and Communities Agency's (HCA) Zone Agents register (Intermediate Affordable Housing) (Chapter 7).
- 4.15 This demonstrates a need for 536 new affordable new homes a year in order to meet existing and newly-arising needs for Social or Affordable Rent. In accordance with Government guidance this assumes an eradication of the backlog of need over a 5 year period (2011 SHMA Figure 7.1).
- 4.16 The 2011 SHMA does, however, recognise that it may be unrealistic to expect the backlog to be addressed over 5 years. Figure 7.3 presents scenarios based on tackling existing needs over different time horizons. This shows that meeting the backlog over a longer period would lower the annual need for affordable housing. This would be more achievable, although this needs to be set against the desirability of meeting affordable housing needs as quickly as realistically possible.
- 4.17 The HCA Zone Agent's register of Intermediate Affordable Housing Needs includes a further 375 households actively seeking this nature of accommodation in the District (para 7.43). This is thought to be an under-estimate and the true figure could be over 700 households. (para 7.44).
- 4.18 Taken together, and assuming the backlog is addressed over 5 years, this would mean a collective total for affordable housing of 684 new homes per year (para 7.53), with a with the majority of need being for

homes for Social or Affordable Rent. The issue of addressing need over a longer period is discussed below in Section 7.

- 4.19 In practice both registers are likely to underestimate housing need both for rented and intermediate forms of affordable housing. As the needs model uses the Council's Housing Register data as an input for existing need it does not identify concealed households or those who have not registered. This "hidden need" is a particular issue in areas such as Winchester with significant rural parts to the District (para 7.7). In terms of Intermediate Affordable Housing, some of those on the Council's Register would also be eligible for this nature of housing. Furthermore an analysis of incomes suggests a much larger potential market for intermediate products (paras 7.44/45).
- 4.20 Most of the District's population live within the **rural areas**. The 2007 SHMA identified that 40% of the District's population lived in settlements of under 3000 population. Housing issues faced in the rural areas are similar in many respects to those in other parts of the District, including significant affordability problems and competition from in-migrants (para. 10.66). Affordability can be particularly challenging with rural residents committing higher proportions of their incomes to housing costs (para. 10.67). This has implications not just for individuals but for communities. Communities become less diverse as younger people leave and older, more wealthy, households arrive. The community networks that complement more formal services are also threatened and local labour markets are affected (para 10.69).
- 4.21 As noted above housing needs in the rural parts of the District are significant. The *Council's Rural Housing Development Action Plan* (2008) estimates over 2000 households with a local connection to one or more rural parish (by means of family or employment) are registered with the Council as being in housing need. More recent assessments of housing need in relation to individual settlements, using evidence drawn from the Council's housing register, local survey information and community events indicate that need remains high in rural areas. This has translated into an appetite for appropriate development to serve housing needs in many parishes, as shown through Blueprint and other consultations.
- 4.22 The 2011 SHMA offers recommendations on the **size of affordable housing** needed. This takes account of evidence of churn in the existing affordable housing stock, as well as headline needs figures.
- 4.23 For Social and Affordable Rented properties, the 2011 SHMA identifies the pressures on different sized dwellings and recommends that around 50% of new homes be built as 3 bed or larger, with up to 20% as 1 bed. In the middle, 2 bed units, provided as a mix of houses and flats can be used flexibly to help meet a broad range of needs (para 8.25).

- 4.24 For Intermediate Affordable Housing, 51% of registered households are looking for 2 bed properties, preferably houses rather than flats (Figure 7.13).
- 4.25 In order to arrive at a preferred policy position it is important take account of the implications of the new **Affordable Rent Product** (ARP) (para 8.15). Therefore the Council commissioned a study specifically on this matter in 2012: [Affordable Rent – Cost, Affordability and Implications for Policy \(AR Study\)](#).
- 4.26 The Affordable Rent Study was commissioned from DTZ by the Council in response to the Government's announcement of a new form of affordable housing – Affordable Rent. The NPPF includes this within the definition of affordable housing. Importantly, the target market is the same as for Social Rent and distinct to that for Intermediate Housing. The model allows for rents of *up to* 80% market rents. In view of the local prices and incomes, and changes to the welfare system, the Council considered it was necessary to consider the implications of the ARP.
- 4.27 Using different geographies the study analysed a variety of rent scenarios, from social rents to market rents, and local incomes, taking account of benefit payments, including the incomes of those on the housing register. It considered the impact of the Local Housing Allowances and, in order to understand the implications of the Single Room Allowance introduced by the Government as part of its welfare reform measures, analysed affordability for Single People under 35 years in age.
- 4.28 While many of the findings have broader local housing strategy implications or are too detailed for consideration in relation to the Local Plan Part 1, some are of relevance here.
- 4.29 In particular (Section 5.1), it is of note that in many parts of the District affordable rents set at 80%, or even close to that level, would create affordability problems for those in housing need. While, for many households benefit levels will rise to accommodate changing rents, and welfare reform ensures a more sensitive relationship between rents, earnings and benefits, some will be adversely affected. Those most adversely affected by such an approach would be larger households, in particular those impacted in by the Universal Credit Cap, and younger single people affected by the Single Room Allowance. These observations reflect the Government's own Impact Assessment.
- 4.30 This means that many of those currently seeking affordable housing would be unable to afford to access even 'affordable' accommodation in the District if rent levels were set at 80% of market values. Furthermore, many younger persons would be unable to afford private rented sector accommodation.

- 4.31 The consequences of this could include the displacement of households to areas outside the District into lower value areas (perhaps a significant distance from their communities and workplace), an increased need for affordable housing as households are unable to meet their needs in the private sector, and households living in over-crowded conditions with a knock-on effect on children.
- 4.32 The Affordable Rent Study (Section 5.3) recommends that if the Council is to make inroads into addressing its priority affordable housing needs it is important that planning policies influence the tenure, type, affordability and location of affordable housing, as well as the overall quantity provided. The Study does not make specific recommendations on the percentage of market rent within the “Affordable Rent spectrum” that is desirable. However, it suggests that in determining rent levels regard be had to the incomes of those in housing need and the implications of benefit limits and caps. Rents outside any parameters that may be set in detailed guidance, for instance a Supplementary Planning Document, may still be counted as affordable housing, however they would better be defined as Intermediate Housing.
- 4.33 The AR Study recommends that guidance should be produced by the Council to provide certainty for developers and landowners in order to ensure accurate assumptions are made about revenues to avoid prejudicing affordable housing development.
- 4.34 The AR Study, acknowledges the relationship between affordability, specifically rents, and development economics. It proposes two options to deal with any situations where this demonstrably threatens the viability of an otherwise acceptable development proposal. Firstly, to allow rental levels to be set at a higher level than desirable (if priority needs are to be met level) but within the 80% limit. Secondly to shift the desired balance between Social/Affordable Rent and Intermediate Affordable housing in favour of the latter. This relationship between affordability and viability is critical in order to ensure a supply of housing. The next section of this paper deals with **viability** issues in more detail.

Winchester Viability Report

- 4.35 Having previously commissioned strategic viability studies to inform the evolution of policy, in 2011 the Council commissioned Adams Intgera consultants to produce a comprehensive strategic viability study that took account of the range of likely costs on development and the implications for affordable housing targets and CIL tariffs. This was published in 2012: (<http://www.winchester.gov.uk/planning-policy/evidence-base/housing/viability-report-2012/>).
- 4.36 The Viability Report modelled a range notional housing scenarios, and took account of different scales of development, development mixes,

locations and affordable housing rental values. The detailed methodology is set out within the study. However, it is worth noting a number of points:

- The consultant brief was drawn up in consultation with development interests.
- The Study considered viability levels in different geographical areas of the District and concluded that the three spatial areas defined in the Local Plan Part 1 were valid as areas for the viability study.
- These were used as a basis for creating spatial viability thresholds (pages 14-16) and “value points” (pages 19, 20).
- A high proportion of sites in the Strategic Land Availability Assessment (SHLAA) are outside settlement boundaries (page 14), though there are a small number of potential new development sites that will be on land that is currently in residential use (pages 15, 30).
- The methodology and the modelling inputs were developed in consultation with developers building within the District (including through meetings and a questionnaire – Appendix 7).
- Through consultation with development interests, the study identified that the “premium” required to incentivise an owner to bring a site forward was approximately 20% over alternative use value (page 13).
- The required profit levels for development, of 20% for market housing and 10% for affordable housing, assumed in the study were derived from questionnaires to development interests and registered providers (page 16).
- In view of the priority attached to the provision of affordable housing by the Council, all scenarios tested the provision of affordable housing (at 30%, 35% and 40% of the total units).
- As a result of this CIL was treated as a residual in the modelling, i.e. what was left after taking account of all other costs and values, including affordable housing provision and developer profit. Appendix 9 sets out what different rates of CIL could be available, based on a range of scenarios, assuming different proportions of affordable housing contribution.
- Appraisals assumed a mix of 70% rented housing (either Social or Affordable Rent at a variety of rent levels drawn from the DTZ Affordable Rent Study) and 30% Intermediate Housing.
- Notional sites of various sizes from 3 dwellings up to 100 units were modelled. Major Development Areas were, therefore, excluded from the study as viability on these sites is subject to site-specific factors and discussion with landowners/developers.

4.37 The Study concludes and recommends (pages 31-35):

- Thresholds could be removed and affordable housing could be secured on all sites (with a commuted payment on sites less than 5 units).

- Affordable rent levels set at 80% of market value produce improved viability when viewed against social rents.
- Given the priority the Council attaches to affordable housing, it would be reasonable to set a requirement for a 40% proportion of affordable housing, with a split of 70% Social/Affordable Rent (with rents at 70% of market level, so in effect Affordable Rent) and 30% Intermediate Affordable.
- Where there are affordability or viability problems it is advised that rent levels be adjusted, particularly on the larger units, the split between tenures is adjusted or the overall proportion of affordable housing is reduced.
- Most development is expected to come forward on sites which are not currently in residential use, with only a modest proportion on sites with existing residential use value, in which case negotiation may be necessary over viability.
- On the basis that the study calculates CIL as a residual, the degree to which CIL can be charged on a site varies in relation to other costs imposed and the site location.
- The Study was carried out at a time of considerable market uncertainty.

Housing Register and Homelessness

- 4.39 The Council's Housing Register records those households accepted by the Council as in housing need. On average a household can expect to wait 6 years for a 3-bed rented property once their need for that type of property has been identified. The Homes in Hants Register also records those people/households requiring intermediate housing. Unmet need remains high at just under 400 households.
- 4.40 Housing need in one of its most acute forms is represented by homelessness cases. The number seeking housing advice has increased over the past year, with those accepted as homeless increasing by 80%. In 2011 the Council had to resort to the use of bed and breakfast accommodation for the first time in many years.
- 4.41 The problems created by these increases are exacerbated by limited new affordable housing supply, both in terms of new build and re-lets, and changes to the housing benefit system for the private rented sector through Local Housing Allowance LHA. This has meant fewer properties in the private rented sector are available and affordable for households on benefits. A snapshot survey of *Rightmove* in early 2012 revealed very few properties falling within LHA levels, with no guarantee that landlords would accept benefit claimants. Households therefore have to choose between living in unsuitable or overcrowded conditions or moving, potentially significant distances, away from their community and employment.

Conclusions from Evidence

4.42 To conclude and summarise, the evidence base indicates:

- That there are high levels of affordable housing need in the District. This has significant implications for individuals seeking housing, but also has wider implications as large numbers of households are unable to afford to live in their communities.
- This has adverse implications for sustainability beyond the social dimension. For instance, an impact on the economy and on the environment through longer commuting distances. It also negatively impacts on the creation of mixed communities, a cornerstone of Government policy.
- The number of households on the Council's housing register remains high and homelessness is increasing.
- Significant numbers of new affordable housing is needed to address housing need, around 650 a year to address existing and newly-arising need within a five year period (though the annual need reduces if these time horizons are extended). This level of need exceeds likely supply.
- Affordable housing needs in rural parts of the District are significant.
- While, in principle, rents of up to 80% of market rents may be acceptable in individual cases, 80% will not always be affordable so should not be treated as a given on every scheme. There is a need to take account of affordability in determining rents in individual circumstances.
- For land where market homes are to be delivered an affordable housing target of 40% of units (70% Social/Affordable Rent, 30% Intermediate Affordable) is reasonable, at rents less than the 80% ceiling.
- Development economics are dependent on a number of things, not least the proportion of affordable housing and the revenues these generate. It is, therefore important to also take account of development economics in determining rents and overall scheme mix. In individual cases it will be necessary to consider what is desirable in terms of rent levels/affordability and scheme mix and, where this puts pressures on scheme economics, to consider how best to meet affordable housing objectives while ensuring scheme viability.
- Most new housing will be developed on land that is not currently in residential use.
- The priority need is for houses that are 3 bedroom or larger in the Social/Affordable Rent sector, and 2 bedroom in the Intermediate sector.
- Account must also be taken of specific housing needs, including those of younger single people, those with disabilities, and older people. This includes considering the type and detailed design of homes.
- The Government's approach to welfare reform has significant implications for individuals, communities and the levels and nature of affordable housing need. Consequently it may have land use planning implications.

5. **Evolution Through Plan Stages**

- 5.1 Policies in the Plan have been through several iterations, been subject to various consultations and developed having regard to the local evidence base and a changing local and national policy landscape.
- 5.2 The early stages of the Local Plan/Core Strategy process involved ‘front-loading’, consideration of and consultation on ‘issues and options’, and the development of the ‘preferred option’ version of the Plan. The strong need for increased provision of affordable housing has been a common theme through each of these stages and there has been very wide acceptance that the Plan should seek to increase the supply of affordable housing, whilst not undermining the viability of the market housing schemes on which much affordable provision depends.
- 5.3 The options which have been tested and consulted on are discussed below and the evidence of affordable housing needs and viability matters are considered above. In view of the clear evidence of need and the wide support for increased provision expressed through the consultation process, all of the early plan-making stages were concerned principally with devising policies which could maximise the amount of affordable housing provision to meet identified needs, whilst avoiding harm to development viability.
- 5.4 The *Blueprint* consultation identified a range of issues relating to affordable housing. In particular, there was a clear desire for more affordable housing, and identification of the need for a mix of homes and housing for an aging population. The provision of family homes was seen as important, as was the need to provide homes for local people and the flexibility of small family housing to meet a variety of needs. These common issues emerged across the three spatial areas. Although the *Plans for Places* consultation was concerned largely with the scale and distribution of development, the issue of affordable housing provision again featured prominently in the comments made.
- 5.5 The policies in the Pre-Submission Plan seek to respond appropriately to existing and new evidence, consultation and local and national policy changes. The result is a set of policies that maintain the imperative of increasing provision to meet affordable housing needs, in some cases varying the initially preferred policy position to better achieve this, in others representing a more subtle refinement.
- 5.6 Significant change is, perhaps, most evident in relation to Policy CP4, which replaces Policy CP20 in *Plans for Places*, and thus allowing a more flexible and locally responsive approach to affordable homes on “exception sites”.

- 5.7 Section 6 below responds to the key points made in representations on the latest consultation on the Pre-Submission Plan, but does not seek to respond to each individual representation.

6. Responses to Representations and Changes in Circumstances

- 6.1 This section provides comment on representations received, although it does not seek to respond to, or record, every representation. It also explains the changes made to the Submitted Plan, as a result of those representations and changes in circumstances, such as the NPPF and updated evidence base.

Policy CP3 Affordable Housing: General Affordable Housing Needs and Provision on Market Led Housing Sites

- 6.2 Amongst the representations received on affordable housing policies, a number were supportive, recognising affordable housing need and reflecting comments made at the *Blueprint* and other stages of plan production. There are no significant challenges to the evidence regarding the scale or nature of affordable housing need.
- 6.3 The most critical comments relate to the alleged lack of evidence to support the 40% expectation for affordable housing in Policy CP3. Several comments challenged the impact this would have on viability, while one objector commented on the need for future monitoring and review of the evidence base and policy. Others propose more flexible policies. Several respondents note that the viability study which was being undertaken had not been published with the Pre-Submission Plan so feel unable to comment in detail.
- 6.4 The Council's Winchester Viability Report has now been published and forms part of the Local Plan evidence base and supports the preferred policy approach. Several respondents (jointly represented by White, Young and Green consultancy) referred to the lack of the latest viability study and their consultant was notified when the Winchester Viability Report was published and given the opportunity to update their comments. This was done and these representations now comment on the adequacy of the Viability Report.
- 6.5 It has been alleged by some respondents that policies were written without reference to the evidence base and that the Study was written in an effort to justify the policy. Such an approach would be pointless as it would undermine the soundness of the policy. The independent consultancy that produced the study has undertaken substantial research and produced sound evidence to support their conclusions. This took place over several months in the run-up to the development of the Pre-Submission Plan and the policies were written having regard to emerging findings and efforts were made to discuss draft reports with development interests, with a meeting being held with one.
- 6.6 Several respondents contend that the Viability Study does not take sufficient account of finance costs. The rate used by the Study derived from the Study questionnaire that was completed by a number of

development interests. Responses to the questionnaire suggested interest rates on development finance of 8%, 6%, 6.5%, 7%, 3.5% above base, 3.5% plus arrangement fee, 3% above Libor plus 1% entrance and exit fees, or 10%. On this basis modelling was carried out on, what was concluded to be an industry norm of 7.5%. It is, therefore, considered that the assumptions in the Study are sound.

- 6.7 A number of respondents criticise the policy approach suggesting that all planning applications will require an accompanying viability appraisal. The Viability Study concludes that 40% will be generally deliverable and that difficulties are generally only likely to arise where sites have a high existing or alternative use value, for instance those in current residential use. Housing numbers on such sites are likely to deliver a small proportion of overall housing numbers and hence the conclusion reached by those respondents is incorrect.
- 6.8 Some respondents proposed greater flexibility in Policy CP3, especially to have regard to impacts on viability. However, it is considered that these matters are adequately dealt with by reference in Policy CP3 to development economics and account being taken of local circumstances. The Policy specifically states that the requirement would apply, *'unless this would render the proposal economically unviable'* and, in addition, Policy CP21 (Infrastructure and Community Benefit) states that the cumulative impact of requirements on viability should be taken into account. This reflects the advice in the NPPF (paragraphs 173-174).
- 6.9 One comment proposed that differential affordable housing requirements be applied to different spatial areas. The Viability Study does not recommend this as an approach and it would create a number of difficulties. It would create a more complex policy landscape which may, over time, become less sensitive to local circumstances as market conditions change. In addition, it fails to take account of the priority that the Council attaches to affordable housing provision and evidence on CIL options.
- 6.10 The preferred policy approach addresses value variations by making clear that the economics of development will be taken into account in individual cases. Furthermore, value variations are addressed in the Winchester Viability Report, which shows that the affordable housing requirements can be met and that any viability issues can be resolved by an appropriate approach in relation to CIL.
- 6.11 Appendix 9 of the Viability Report illustrates the impact that the different Value Points have on CIL tariffs that could be charged while maintaining viability. CIL tariffs will be set taking account of the Report's findings. If, in relation to specific development proposals, there are viability difficulties, the requirements for affordable housing can be negotiated, alongside other planning priorities relating to the proposal, within the terms of Policies CP3 and CP21.

- 6.12 Some of those responding propose further policy detail. It is intended to provide further guidance through a Supplementary Planning Document. However it is considered the policy is sufficiently detailed and that the Local Plan Part 2 will provide the opportunity to add more detail, should this be necessary or beyond what could appropriately be incorporated into SPD.
- 6.13 A number of changes have been made between the Pre-Submission and Submitted Plans. Policy CP3 is revised with a minor change to refer to priority housing needs. This is to emphasise that provision should be suitable to meet the needs of those most in need locally, which will be determined through up to date evidence. Sections of explanatory text are rationalised in order to provide a more cohesive explanation of the preferred policy approach. Text has been reviewed to make it consistent with the NPPF and evidence on housing need (and priority housing needs). References to affordable housing needs have been updated to respond to representations and to reflect the now completed Affordable Rents Study and 2011 SHMA. The section on monitoring has been revised to make reference to housing need in response to representations proposing further studies to assess need beyond 2016.

Policy CP4: Affordable Housing on Exception Sites to Meet Local Needs

- 6.14 Representations on Policy CP4 did not seek to fundamentally challenge the principle of “exception sites”, nor of allowing a variety of tenures, and a representation of support was received. However, there were some critical comments on the detail of the policy.
- 6.15 A number of those making representations commented that the policy was too restrictive and required simplification. These comments have been taken on board and amendments to the policy and explanatory text are proposed. These do not change the general thrust of the policy, however, they do provide greater clarity and simplicity.
- 6.16 Several of those making representations challenged the policy of providing no less than 70% of the homes on a specific site to meet priority needs. No alternative proportion was necessarily proposed or justified by these respondents however, so any change would be neither justified nor evidence-based. Paragraph 5.28 sets out the justification for the 70% figure and this is based on evidence work the Council has undertaken in its *Local Connections Study (2010)* (<http://www.winchester.gov.uk/planning-policy/evidence-base/housing/local-connections-housing-study2010/>). This recommends 70% of homes be developed for rent (the priority need), with 30% intermediate affordable housing (page 20). In order to ensure policies should be compliant with the (then current) PPS3, the study

recommended against open market housing. It concluded that discounted market sale homes would create sufficient value to incentivise development while ensuring homes fell within the affordable housing definition. The NPPF (para 54) makes it clear that it is for planning authorities *‘to consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs’*. There is, therefore, no requirement in the NPPF to allow for market housing on exception sites.

- 6.17 The Council has considered the pros and cons of allowing market housing on exception sites, particularly the conclusions of the Local Connections Study. There is no particular experience of a lack of sites being made available for exceptions schemes, or that the inclusion of market housing would significantly increase the number coming forward. The Local Connections Study made the point that the number of sites coming forward would need to increase substantially just to offset the affordable units that would be replaced by market housing. It was, therefore, clear that market housing should only be allowed where there was a particular justification, such as to overcome a site-specific viability issue.
- 6.18 Policy CP4 reflects this approach and seeks to ensure that exception sites can only include a proportion of market housing (up to 30%) if certain criteria are met. These relate to abnormal site/viability circumstances or housing needs and were set out as a series of bullet points in the Pre-Submission version of CP4. This has been simplified in the Submitted Policy CP4. It is important to bear in mind the objective of the Local Plan policy is specifically to facilitate the provision of affordable housing. The policy is clear that there is a tipping point beyond which there is no longer a justification for releasing sites on which housing development would otherwise be unacceptable.
- 6.19 One representation commented on the scale of development, making reference to one potential development of 2000 homes. Policy CP4 requires development to be suitable in size and to avoid harm to the character of the area or other planning objectives. Paragraph 5.30 sets out the expectation that development will be small in scale, even if provided in relation to larger settlements.
- 6.20 Another suggested too much emphasis is being placed on strategic allocations. This matter is addressed in other Background Papers, but generally the LDF will allocate other sites for development in consultation with local communities. Specifically, policy CP4 provides for land to be allocated for affordable housing, including through a Neighbourhood Plan.

7. Reasonable Alternatives Considered

- 7.1 The Council has considered a number of alternative approaches to deal with affordable housing.
- 7.2 The Sustainability Appraisal of the Local Plan Part 1 Pre-Submission concluded that Policy CP3 will positively progress sustainability objectives in relation to communities, housing provision and health, with major cumulative effects for promoting housing for all and social inclusion. It also noted that overall the Policy CP4 is strongly positive for Sustainability Appraisal objectives in relation to communities and housing provision, with major cumulative effects for promoting housing for all and social inclusion. It suggested no mitigation or enhancement measures were necessary.
- 7.3 Do nothing. It is clear from representations on Blueprint that there is a desire amongst communities to provide more affordable housing. Furthermore there is significant evidence that there is a shortage of affordable housing. The provision of affordable housing is, therefore a priority of the Council and this Plan. It is not considered appropriate to adopt this option.
- 7.4 Adopt differential affordable housing requirements across spatial areas. Given the importance attached to affordable housing provision by the Council and the evidence on need and viability, any differences in development values and viability across the District can be dealt with by ensuring that CIL tariffs are developed at differential levels across spatial areas. The policies make clear that, in considering individual proposals, account will be taken of development economics in order to ensure viability. Therefore, it is not considered appropriate, justified or evidence-based to adopt this option.
- 7.5 Adopt alternative percentages for affordable housing on mixed tenure sites. Studies carried out to develop the policies support the approach taken, which balances the desire to meet affordable housing needs with the need to ensure that schemes remain attractive to develop by developers and landowners remain willing to bring land forward for development. The Viability Report provides evidence that higher percentages may reduce the capacity to secure sustainable construction and/or CIL, or impact negatively on both affordable housing and overall housing supply due to development economics. Lower percentages would undermine the Council's ambition of maximising new affordable housing delivery within a reasonable period of time. The 2011 SHMA shows that it is expected to take around 10 years to clear the current backlog of housing need, as well as newly-arising needs, using a 40% affordable housing requirement. A lower level of provision would extend this timescale even further and it is not considered appropriate or justified by the evidence to adopt this option.

- 7.6 *Eradicate the backlog of affordable housing need more quickly, or more slowly.* There is a significant backlog of housing need and newly arising need. There is little point in increasing yet further the time that people need to live in unsuitable housing. Therefore it is sensible to set the most ambitious requirements, which are realistic and viable, in order to try to meet housing needs as quickly as *reasonably* possible. However, it is important to take account of other factors in determining what is *reasonable*.
- 7.7 The delivery of affordable housing is linked to overall housing supply. As part of determining these overall housing supply targets the Council considered a number of scenarios (see the Housing Technical Paper and Housing Background Paper). This included deriving targets from Affordable Housing-Led Projections <http://www.winchester.gov.uk/planning-policy/evidence-base/housing/housing-technical-paper-2011/>), but these were found to double-count the existing backlog and depend on a variety of uncertain assumptions. The NPPF (para 47) makes clear that Local Plans should meet the full, objectively-assessed housing needs of the area, as far as is consistent with the policies set out in the NPPF. The evidence from the 2011 SHMA shows that affordable housing needs will be met by the proposed approach, within a reasonable timescale. Hence, although a priority is given to the provision of affordable housing in the Local Plan this does need to be consistent with other policies in order to decide what is *reasonable*.
- 7.8 The planning system's role is to balance interests in order to arrive at sustainable solutions, rather than to exclusively promote one interest at the expense of another. To do so would undermine the principles of sustainable development. To derive overall housing targets based solely on affordable housing need would, therefore, while potentially reducing outstanding housing need more quickly, be unreasonable due to it excluding consideration of other needs and impacts.
- 7.9 Consequently, the Local Plan policies are framed to ensure that, through a combination of requirements and permissive policies, significant efforts are made to increase affordable housing supply and reduce outstanding need as quickly as reasonably possible. Within viability parameters, Policy CP3 requires market led sites to provide a proportion of homes as affordable housing.
- 7.10 The overall housing supply targets in the Local Plan will not be treated as a ceiling and the policies allow additional housing to be provided, particularly in response to local needs. Policy CP4 provides for additional affordable housing to be provided (over and above the requirements of Policy CP1) on land where housing development would not normally be permitted. This has the potential to increase affordable supply further and reduce outstanding need more quickly.

- 7.11 Furthermore, it provides communities with the ability to promote and deliver affordable housing to meet local needs, for instance using Neighbourhood Plans.
- 7.12 Finally, the Council is actively engaged in promoting and delivering additional affordable housing, not least through the HARA partnership and its own new build programme of Council houses with a programme in excess of £40m.
- 7.13 The policies proposed strike the correct balance between reducing affordable housing need as quickly as is reasonably possible and other Plan objectives. It is informed and justified by the available evidence, which is relevant and up to date. Consequently, it is not considered appropriate to adopt any of the alternative options.

8. Conclusions

- 8.1 The evidence base has demonstrated significant affordability problems in the District and that there are very high, and increasing, levels of affordable housing need. This need exists in urban and rural areas and across a broad range of household types.
- 8.2 The evidence and consultation exercises carried out throughout the evolution of the Plan have shown recognition of the problem and a support for more affordable housing, particularly to meet local needs. Not to provide additional affordable housing would mean that households would be housed in unsuitable accommodation. Not only would this have personal consequences, but also broader implications for the District's social, economic and environmental sustainability.
- 8.3 Consequently, the Council's approach is to enable the development of more affordable housing as a priority and to aim to maximise provision. The highest need is for rented housing, either Social or Affordable Rent. It will be important to ensure homes are genuinely affordable to those in priority need.
- 8.4 New homes must contribute towards creating sustainable, mixed communities. While there is a need for a broad range of affordable housing, the provision of family accommodation will be of priority. Attention will be paid to ensuring affordable housing is well integrated with other forms of housing and is designed so it is fit for purpose.
- 8.5 Policy CP3 aims to ensure all new development contributes towards affordable housing delivery with a target of 40% set. The Council recognises the need to ensure schemes are viable. It has therefore framed its draft planning policies to take account of the conclusions of the Winchester Viability Report. Flexibility is provided within Policies CP3 and CP21 to allow site specific development economics to be taken into account.
- 8.6 In recognition that affordable housing delivered as a result of Policy CP3 will be insufficient to meet housing needs immediately, and as a consequence of consultation responses, Policy CP4 allows for additional affordable housing to be provided to address specific local needs. This complements the Council's broader strategic approach to affordable housing provision, including investing its own resources to build Council housing.
- 8.7 The Sustainability Appraisal supports the approach and suggested no mitigation or enhancement measures.
- 8.8 Further guidance on implementation will be provided in an Affordable Housing Supplementary Planning Document and monitoring takes place through the Annual Monitoring Report.

- 8.9 Finally, the Plan's policies on affordable housing are considered to be in conformity with the NPPF.